

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

**CHARLES WARD KUENTZEL 2<sup>ND</sup>,**  
[DOB: 10-15-1995]

Defendant.

No. 21-5039-01-CR-SW-SRB

**COUNT 1**

18 U.S.C. §§ 2251(a) and (e)  
NLT 15 Years Imprisonment  
NMT 30 Years Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years, or Life, Supervised Release  
Class B Felony

**COUNT 2**

18 U.S.C. §§ 2252(a)(2) and (b)(1)  
NLT 5 Years Imprisonment  
NMT 20 Years Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years, or Life, Supervised Release  
Class C Felony

**FORFEITURE ALLEGATION**

18 U.S.C. § 2253

Restitution

\$100 Special Assessment

\$5,000 JVTA Special Assessment

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Sexual Exploitation of a Child)  
18 U.S.C. § 2251(a)  
18 U.S.C. § 2251(e)

Beginning on an unknown date, but as early as September 1, 2020, and continuing through April 21, 2021, said dates being approximate, in Jasper County, in the Western District of Missouri, the defendant, **CHARLES WARD KUENTZEL 2<sup>ND</sup>**, employed, used, persuaded, induced, enticed, and coerced a minor, Jane Doe, to engage in sexually explicit conduct for the purpose of producing a

visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 2**

(Receipt of Child Pornography)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)(1)

Beginning on an unknown date, but as early as September 1, 2020, and continuing through April 21, 2021, said dates being approximate, in Jasper County, in the Western District of Missouri, the defendant, **CHARLES WARD KUENTZEL 2<sup>ND</sup>**, knowingly received any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**FORFEITURE ALLEGATION**

The allegations contained in Count 1 and Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, the defendant shall forfeit to the United States of America:

1. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;
2. Any property, real or personal, constituting or traceable to gross profits or other proceeds

obtained from the offense; and

3. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, or any property traceable to such property.

The property to be forfeited includes, but is not limited to, electronic devices seized on or about August 26, 2021, from 520 Pine Street, Carthage, Missouri.

#### **SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty,

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

#### **A TRUE BILL**

*/s/ Monica Stone*  
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FOREPERSON OF THE GRAND JURY

*/s/ Stephanie Wan*  
\_\_\_\_\_  
**STEPHANIE L. WAN**  
Assistant United States Attorney  
Missouri Bar #58918  
Dated: 08/31/2021  
\_\_\_\_\_  
Springfield, Missouri